
October 8, 2020

Via ECF

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007-1312

Re: United States v. Victor Mones Coro
19 Cr. 144 (AKH)

Dear Judge Hellerstein:

We write on behalf of Victor Mones Coro to respectfully request that Mr. Mones' sentencing, currently scheduled to take place on October 21, 2020, at 11:00 a.m., be adjourned because of the government's ongoing production of discovery, to November 18, 2020 at 9:00 a.m.

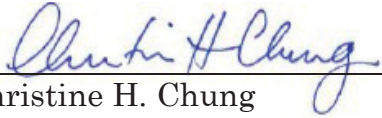
The government continues to produce discovery that bears on mitigation of Mr. Mones' potential sentence. *See Brady v. Maryland*, 373 U.S. 83, 87 (1963) (information favorable to the defense includes evidence that "would tend to exculpate [the defendant] or reduce the penalty"). At the September 23, 2020 status conference, the Court ordered the government to complete making its discovery productions by October 23, 2020. The government informed us last week that it expects to produce, at a minimum, the contents of multiple computers and several boxes of files seized during a search of the Confidential Source's workplace after the last status conference. The government stated that it may also produce new investigative reports and notes, but has not provided the date by which it expects to complete its production(s). Nor has it given an estimate of the volume of electronic data that it expects to produce.

The government's late, voluminous productions continue to put Mr. Mones in the unfair dilemma between awaiting potentially discovery relevant to his sentence and adjourning his sentencing date while he continues to be detained. Since Mr. Mones requested sentencing discovery this past May and June, including *Brady* and *Giglio* material, the government has made nine productions of nearly 500 gigabytes of material.

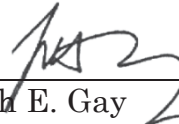
We emailed the government last evening about this request but have not received a response. We will await the upcoming government production to assess

how long it will take the defense to review the production and what motions might follow.

Respectfully submitted,



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cc: All counsel (via ECF)